

EXHIBIT C

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO
SAVERIN, DUSTIN MOSKOVITZ, ANDREW
MCCOLLUM, CHRISTOPHER HUGHES
AND THEFACEBOOK, INC.,

Defendants.

CIVIL ACTION No.: 1:04-cv-11923
(DPW)

MARK ZUCKERBERG, and
THEFACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC, CAMERON
WINKLEVOSS, TYLER WINKLEVOSS, and
DIVYA NARENDRA,

Counterdefendants.

**DECLARATION OF BHANU K. SADASIVAN IN SUPPORT OF DEFENDANT
EDUARDO SAVERIN'S OPPOSITION TO CONNECTU'S MOTION TO
COMPEL**

I, Bhanu K. Sadasivan, declare as follows:

1. I am an attorney licensed to practice law in the State of California and am admitted *pro hac vice* in this United States District Court. I am an associate at the law

firm of Heller Ehrman LLP, counsel for Defendant Eduardo Saverin in this action. I have personal knowledge of the facts set forth in this declaration.

2. On July 13, 14, 18, and 26, 2005, I participated in a meet and confer telephone conversations with counsel for ConnectU, LLC and counsel for Defendants Thefacebook, Inc., Mark Zuckerberg, Dustin Moskovitz, Andrew McCollum, and Christopher Hughes.

3. Regarding ConnectU's requests for all documents relating to the subject matter of the action, counsels for Defendants took the position that such requests were overbroad and burdensome and sought irrelevant documents. Defendants further contended that their initial response to these document requests, agreeing to produce responsive documents created before May 21, 2004, was reasonable and proper.

4. Counsels for Defendants, nonetheless, offered to produce further responsive documents created after May 21, 2004, provided ConnectU identified its trade secret claims and/or made more specific its requests. ConnectU's counsel refused to narrow its request, stating instead that ConnectU was entitled to all documents.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 17th day of August, 2005, at Menlo Park, California.



Bhanu K. Sadasivan